



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 9, 2013

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Kevin R. Kutcel
Agent for OdorStar LLC
KRK Consulting LLC
5807 Churchill Way,
Medina, OH 44256

Subject: NosGuard SG
EPA Reg.#: 87508-2
Notification Date: March 28, 2013
Receipt Date: April 1, 2013

Dear Mr. Kutcel:

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)(7)(a).

Proposed Notification:

Update the Storage and Disposal Statement per PR Notice 2007-4 to add two pouch sizes (5 and 50 grams) for NosGuard SG (EPA Reg.#: 87508-2). The submitted label dated 03/28/2013 (pin punch 04/01/13).

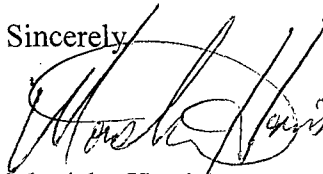
General Comment:

Based on the review of the material submitted, the notification application to 5 and 50 grams pouches statement is **acceptable**.

This notification and a copy of this letter have been inserted in your file for future reference.

If you have any questions on this letter, please contact David Liem by email at liem.david@epa.gov or call at 703-305-1284.

Sincerely,



Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

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United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number OdorStar LLC / 87508-2	2. EPA Product Manager Monisha Harris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OdorStar LLC / NosGuard SG	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) OdorStar LLC 4041 S.W. 47th Avenue Fort Lauderdale, FL 33314 <input type="checkbox"/> Check if this is a new address.	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please see attached cover letter.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 5,10,25,50 gram		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Kevin R. Kutcel		Title Agent	
		Telephone No. (Include Area Code) 440-263-7305	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Kevin R. Kutcel		5. Date Mar 28, 2013	

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E-mail: kevinkutcel@gmail.com

March 28, 2013

Ms. Monisha Harris – PM 32
US Environmental Protection Agency (NOTIF)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: PR Notice 1998-10 Notification for Additional Pouch Sizes (Reg. No. 87508-2)

Dear Ms. Harris,

Please accept one copy of the label for “NosGuard SG” (Reg. No. 87508-2) with the following minor changes highlighted:

1. Addition of pouch sizes 0.17 wt. oz. (5 grams) and 1.76 wt. oz. (50 grams)
2. For the same pouch sizes, the area to be treated as shown on top of page 2.

It is my understanding that these changes qualify as notifications per PR Notice 1998-10. Please note that the area to be treated per the size of the pouch remains the same as on the stamped label. For example, the 5 gram pouch treats 500 ft³ which is 50% the area of the 10 gram pouch and the 50 gram pouch treats 4,500 ft³ which is twice the area of the current 25 gram pouch on the stamped label. Attached are three copies for the US EPA with the changes included.

Attached is EPA Form 8570-1 regarding this notification as required in PR Notice 1998-10. This notification is consistent with the guidance in PR Notice 1998-10 and the requirements of EPA's regulations at 40 CFR 156.46, 156.140, 156.144, 156.146 and 156.156 and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand this it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of PR Notice 98-10 and CFR 156.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please note that KRK Consulting LLC is the authorized agent handling all correspondence for OdorStar LLC and therefore all responses should be directed to the contact information on the letterhead above.

Best Regards,

Kevin R. Kutcel,
Agent for OdorStar LLC

Changes Highlighted 3/28/13

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PRECAUTIONARY STATEMENTS

HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if inhaled. Avoid breathing vapor. Causes moderate eye and throat irritation. Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or going to restroom.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not contaminate water with this product.

CHEMICAL/PHYSICAL HAZARDS

This product contains an oxidizing agent. Do not mix with acids or chlorine. Avoid any contact with flame or burning materials.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

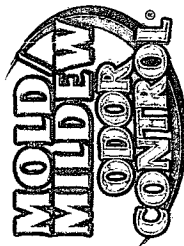
STORAGE: Store this product in the original unopened packaging until ready for use. Store in a cool, dry, well-ventilated area away from heat or open flame. Store in an area that is inaccessible to children.

EMERGENCY HANDLING: In case of spill, contamination or decomposition, do not reseal package. If possible, isolate package and discard it in open and well-ventilated area.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Discard empty packaging pouch and spent NosGUARD SG pouch in an outdoor refuse container.

NOTIFICATION

Date Reviewed: 4-9-13
Reviewed By: D. H. H. H.



NosGUARD SG

Deodorizing delivery system (pouch) for the generation of chlorine dioxide for use as control of odor-causing bacteria, mold and mildew and chemical odors in un-occupied confined spaces; automobiles (Cars, Trucks, RV's, Trailers), commercial storage and refuse containers, boat cabins and porta-potties where moisture is present.

ACTIVE INGREDIENT: Sodium Chlorite 16%
OTHER INGREDIENTS: 84%
Total 100%

Available Chlorine 25%

KEEP OUT OF REACH OF CHILDREN

CAUTION:

HEALTH HAZARDS: THIS PRODUCT IS DANGEROUS WHEN ACTIVATED. Once this product is activated, it will produce "DANGEROUS LEVELS" of chlorine dioxide gas. Chlorine dioxide gas is a strong oxidizing agent. Chlorine dioxide is irritating to the respiratory tract. The symptoms of chlorine dioxide intoxication depend on its concentration and on the exposure time; they include lacrimation, headache, vomiting, severe cough, asthmatic bronchitis, dyspnea and even death. **DO NOT INHALE CHLORINE DIOXIDE.** Exposure to high concentrations of chlorine dioxide can cause death. Do not allow unprotected persons to be exposed to chlorine dioxide gas.

EPA REG. NO. 87508-2
EPA ESTABLISHMENT NO. 62788-AL-001

Net Wt: 0.17 oz/0.35 oz/ 0.88 oz/ 1.76 oz
(5 grams/10 grams/25 grams/50 grams)

MANUFACTURED BY:

ODORSTAR®, LLC
4041 S.W. 47th Ave.

Ft. Lauderdale, FL 33314

(800) 327-8583 • Made in U.S.A.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. Individual NosGUARD SG pouch must only be opened from the packaging pouch prior to use.
2. Do not cut or tear open individual NosGUARD SG pouch.
3. NosGuard SG may be used in automobiles (Cars, Trucks, RV's, Trailers); commercial storage and refuse containers; boat cabins; and porta-potties.

FIRST AID:	
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes• Remove contact lenses. If present, after the first 5 minutes, then continue rinsing eye• Call a poison control center or doctor for treatment advice
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow• Do not induce vomiting unless told to do so by the poison control center or doctor• Do not give anything by mouth to an unconscious person
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing• Rinse skin immediately with plenty of water for 15-20 minutes• Call a poison control center or doctor for treatment advice
If inhaled	<ul style="list-style-type: none">• Move person to fresh air• If person is not breathing, call 911 or an ambulance, then give mouth to mouth, if possible• Call a poison control center or doctor for further treatment advice

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call (800) 327-8583.

NosGUARD SG

**MOLD/
MILDEW
ODOR
CONTROL**

Directions For Specific Uses

5 GRAM POUCH, Each pouch will treat 500 cu. ft. (an area approximately 10' H x 10' L by 5' W)
10 GRAM POUCH, Each pouch will treat 1,000 cu. ft. (an area approximately 10' H x 10' L by 10' W)
25 GRAM POUCH, Each pouch will treat 2,250 cu. ft. (an area approximately 15' H x 15' L by 10' W)
50 GRAM POUCH, Each pouch will treat 4,500 cu. ft. (an area approximately 15' H x 15' L by 20' W)

Slow Release System

NosGUARD SG Mold/Mildew Odor Control System
is designed to maintain air quality while
preventing the formation of future foul odor.

NOTE: People and pets must not be present in enclosed area when the
NosGUARD Slow Release Mold/Mildew Odor Control System is activated.
Use the enclosed caution placard to record treatment/safe re-entry time.

DIRECTIONS FOR USE: Open the foil packet and remove the white inner pouch. (DO NOT OPEN WHITE POUCH.) Insert the white inner pouch into the clamshell. Snap the clamshell securely closed and place it on a stable, level surface. Make sure the side with the holes is facing up. Do not hang the clamshell container. Chlorine dioxide vapor is slightly corrosive in close proximity to pouch. Keep approximately 18" away from fabrics, leather, electronics, mirrors, metals or plated surfaces. After the system has been used, discard the clamshell container and inner pouch in an outside refuse container. Redo treatment every 3 months for best results. Place enclosed placards at all entry points to the area to be treated. Once treatment is completed, the area must be aerated for at least 1 hour prior to re-entering. Open doors/window/vents to accomplish aeration. Do not place vehicles or containers to be treated in a residential garage or other enclosed areas that do not have adequate ventilation. People and pets must not be in the vehicle or container undergoing treatment while the system is activated.

COVERAGE AREA: Use one pouch per cabin. If you need to treat a larger area, use 2 pouches placed equally apart at either end of the area.

Specific Uses

Outside Storage Containers
(Small Storage Containers, Commercial Storage Containers,
Commercial Shipping Containers, etc)

Place the unit in an open area.

Outside Waste & Refuse Containers

(Commercial Trash Cans, Receptacles, Dumpsters, etc)

Place the unit in, above or adjacent to the trash can or dumpster.

Automobiles (Cars, Trucks, RVs, Trailers)

Place the unit near the center of the car for best performance, approximately 18" away from mirrors and electronics. Close windows and allow to work for 12 hours. After 12 hours, remove unit and discard. Run air conditioner and allow interior to air out for 1 hour after use before re-entering the car.

Boat Cabins

Place the unit near the center of the cabin in an open area out of reach of children and pets.

Porta-Potties

Place the unit near the center of the porta-potty in an open area, approximately 18" away from mirrors.

Fast Release System

NosGUARD SG Mold/Mildew

**Odor Control System is designed to provide
immediate relief from mold odor or other foul odors.**

NOTE: People and pets must not be present in enclosed area when the
NosGUARD Fast Release Mold/Mildew Odor Control System is activated.
Use the enclosed caution placard to record treatment/safe re-entry time.

DIRECTIONS FOR USE: Moisten the sponge - the sponge should only be damp, not dripping wet. Place the moistened sponge into the clamshell container. Next, open the foil packet and remove the white inner pouch. (DO NOT OPEN WHITE POUCH.) Insert one end of the white inner pouch into the slit in the sponge, then place in the clamshell. Snap the clamshell securely closed and place it on a stable, level surface. Make sure the side with the holes is facing up. Do not hang the clamshell container. Chlorine dioxide vapor is slightly corrosive in close proximity to pouch. Keep approximately 18" away from fabrics, leather, electronics, mirrors, metals or plated surfaces. Place enclosed placards at all entry points to the area to be treated. Once treatment is completed, the area must be aerated for at least 1 hour prior to re-entering. Open doors/window/vents to accomplish aeration. Do not place vehicles or containers to be treated in a residential garage or other enclosed areas that do not have adequate ventilation. People and pets must not be in the vehicle or container undergoing treatment while the system is activated.

COVERAGE AREA: Use one pouch per cabin. If you need to treat a larger area, use 2 pouches placed equally apart at either end of the area. Allow at least 4 to 6 hours for the system to work. (Not recommended for more than 24 hours.)

Specific Uses

Boat Cabins

Place the unit near the center of the cabin in an open area. Open any doors, cabinets and drawers that require treatment.

Automobiles (Cars, Trucks, RVs, Trailers)

Place the unit near the center of the car, approximately 18" away from mirrors and electronics. Close windows and allow to work for 4 hours. After 4 hours, remove unit and discard. Run air conditioner and allow interior to air out for 1 hour after use before re-entering the car.

Outside Waste & Refuse Containers

(Commercial Trash Cans, Receptacles, Dumpsters, etc)

Place the unit in, above or adjacent to the trash can or dumpster.

Outside Storage Containers

(Small Storage Containers, Commercial Storage Containers,
Commercial Shipping Containers, etc)

Place the unit in an open area.

Porta-Potties

Place the unit near the center of the porta-potty in an open area, approximately 18" away from mirrors and out of reach of children and pets.